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14 UNITED STATES DISTRICT COURT
15 NORTHERN DISTRICT OF CALIFORNIA
16 OAKLAND DIVISION

17 IN RE COLLEGE ATHLETE NIL
18 LITIGATION

Case No. 4:20-cv-03919 CW

DECLARATION OF GRANT HOUSE
PURSUANT TO N.D. CAL. LOCAL RULE 79-
5(f)(3) IN SUPPORT OF JOINT OMNIBUS
SEALING MOTION

Judge: Hon. Judge Claudia Wilken

1 I, GRANT HOUSE, declare as follows:

2 1. I am a plaintiff in the action titled *In re College Athlete NIL Litigation*, Case No. 4:20-
3 cv-03919 CW, filed in the U.S. District Court for the Northern District of California, Oakland
4 Division.

5 2. I submit this declaration in support of the Joint Omnibus Sealing Motion. Based on
6 personal knowledge or discussions with counsel about the matters stated herein, if called upon, I
7 could and would competently testify thereto.

8 3. I understand that the joint stipulation filed by Plaintiffs and Defendants in the above
9 captioned case sought “an order adjusting the sealing procedures for the Parties’ class certification
10 briefing papers and related documents as set forth in Local Rule 79-5.” Case No. 4:20-cv-03919-
11 CW, ECF No. 204. I further understand that on October 12, 2022, the Court granted the parties’
12 stipulation, allowing any designating party to file a statement or declaration in support of sealing, as
13 set forth in Local Rule 79-5(f)(3), fourteen days from filing the Omnibus Sealing Motion. ECF No.
14 207 (“Stipulated Sealing Order”).

15 4. I make this declaration on behalf of the Plaintiffs’ and my own privacy interests in
16 response to the Stipulated Sealing Order to maintain the provisional sealing of my personal private
17 information (“Confidential Material”) that was provisionally filed under seal in support of dispositive
18 motions. The Confidential Material is narrowly tailored and consists of the following:

19 5. **Exhibit 48 to Plaintiffs’ Motion for Class Certification**, ECF No. 209-1: Exhibit 48
20 contains my response to Defendant’s First Set of Interrogatories. My response includes sensitive,
21 personal information that should remain under seal. Defendants’ First Set of Interrogatories,
22 specifically Interrogatory No. 1 and No. 7, requested I disclose actions I undertook to use my NIL
23 and to disclose “all revenues” that I earned related to my NIL. This required that I disclose private
24 and confidential individual contract terms and compensation value, as well as the identity of the
25 contracting parties.

26 6. Sealing this Confidential Material is consistent with the confidentiality protections of
27 the Second Stipulation and Order Supplementing and Amending Protective Order Regarding Highly
28 Confidential – Counsel Only and Conference Strictly Confidential Information. ECF No. 181.

1 7. Disclosure of the Confidential Material identified in paragraph 5 may impact my
2 business relationships with sponsoring entities and inhibit my ability to negotiate contractual terms
3 with parties in the future. As such, sealing this material is necessary to protect my current and future
4 personal, financial interests.

5 I declare under penalty of perjury under the laws of the United States that the foregoing is
6 true and correct. Executed this ²⁹_____th day of September 2023 at Tempe, Arizona.

7 DocuSigned by:

8 Grant House

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GRANT HOUSE